



United States Environmental Protection Agency
Washington, DC 20460

Work Assignment Number

WA-1-3

Work Assignment

☒ Original ☐ Amendment Number:

Contract Number
EP-W-11-044

Contract Period

Base ☒ Option Period Number: **1**

Title of Work Assignment

**Discharge Monitoring Report
Pollutant Loading Tool**

Contractor
Eastern Research Group

Specify Section and Paragraph of Contract SOW
Task Area II.4 - 6, III.2.a,

Purpose: ☒ Work Assignment Initiation ☐ Work Assignment Close-Out
☐ Work Assignment Amendment ☐ Incremental Funding
☐ Work Assignment Approval

Periods of Performance

From: **06/06/13** To: **06/05/15**

Comments:

The purpose of this work assignment is to assist EPA with several versions/updates to the DMR Pollutant Loading Tool. EPA estimates 920 hours of effort will be required to complete this task.

☐ Superfund

Accounting and Appropriations Data

☒ Non-Superfund

Line	DC (Max 6)	Budget/FYs (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount	(Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1											
2											
3											
4											
5											

Authorized Work Assignment Ceiling

Contract Period:	Cost/Fee	LOE
Previously Approved	\$0.00	0
This Action	\$0.00	920
Total	\$0.00	920

Work Plan / Cost Estimate Approvals

Contractor WP Dated: Cost/Fee: LOE:

Cumulative Approved: Cost/Fee: LOE:

Work Assignment Manager Name
Carey Johnston

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(Signature) (Date)

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Contracting Officer Name

Cara Lynch

(Signature)

6/6/13
(Date)

Branch/Mail Code **3803R**
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Contractor Acknowledgement of Receipt and Approval of Workplan (Signature and Title)

Date

**STATEMENT OF WORK
CONTRACT NO. EP-W-11-044**

WA No. 1 - 3

1. **TITLE:** Discharge Monitoring Report Pollutant Loading Tool
2. **PERIOD OF PERFORMANCE:** From Date of Issuance through June 5, 2015.
3. **EPA Work Assignment Manager (WAM):**

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4. **BACKGROUND**

National Pollutant Discharge Elimination System (NPDES) permitting authorities (States and EPA Regions) require facilities that discharge wastewater pollution to surface waters to report their discharges on Discharge Monitoring Reports (DMRs). EPA requires NPDES permit authorities to record some of this DMR data into EPA's database: Integrated Compliance Information System-National Pollutant Discharge Elimination System (ICIS-NPDES).¹ Under the previous work assignment under the base period of this contract, EPA developed the DMR Pollutant Loading Tool ("Loading Tool") and made this new tool available to the public. The tool is comprised of a back-end Oracle database with web-enabled front end for user queries (Oracle Database Server 11G, CommonSpot EPA Template, ColdFusion). The Loading Tool includes pollutant discharge data from all states and territories.

EPA designed the Loadings Tool to allow users to determine who is discharging, what pollutants they are discharging and how much, and where they are discharging. Pollutant loadings are presented as pounds per year and as toxic-weighted pounds per year to account for variations in toxicity among pollutants. The tool ranks dischargers, industries, and watersheds based on pollutant mass and toxicity, and presents "top ten" lists to help determine which discharges are important, which facilities and industries are producing these discharges, and which watersheds are impacted. The Loading Tool increased access to wastewater pollutant discharge data will allow for multiple uses of pollutant discharge information (e.g., writing NPDES permit limits, developing pollution budget plans for watersheds, and watershed modeling). The Loading Tool also assists EPA and states perform better targeting for inspections

¹ See: ICIS-NPDES Policy Statement,
<http://www.epa.gov/compliance/resources/policies/monitoring/cwa/npdescms.pdf>.

and enforcement actions by focusing limited compliance and enforcement resources on those facilities with the most potential to negatively impact the environment. The Loading Tool is one of the key projects identified in the implementation plan for the Clean Water Action Plan.

5. PURPOSE AND OBJECTIVE

Under this work assignment the contractor will enhance the Loading Tool to allow for closer integration with the Agency's main source of compliance and enforcement data, the Enforcement & Compliance History Online (ECHO) website. This work will also help implement the Clean Water Action Plan. In particular, the Clean Water Action Plan "Master Project List" identifies the Loading Tool as a key task for implementing Fundamental Change 1 (Switch existing paper reporting to electronic reporting with automated compliance evaluations and improved transparency of the NPDES program) and Fundamental Change 3 (Address the most serious water pollution problems by fundamentally re-tooling key NPDES permitting and enforcement practices, while continuing to vigorously enforce against serious violators). This work assignment also directs the contractor to enhance the Loading Tool with recommendations made during the public comment process and update the supporting documentation and help files for the Loading Tool. These updates will enable EPA to publicly release Version 1.2 and Version 2.0 of the Loading Tool by the end of July and September 2013, respectively. The computer codes developed for this work assignment will be Agency property. This work assignment is estimated to require 920 hours of labor.

6. Scope of Work

Task 1 – Program Management

The contractor shall develop a work plan describing the necessary steps and estimated hours to complete each of the tasks included in this work assignment. The work plan shall also include a list of the key personnel to participate in the work assignment. The contractor shall also estimate direct costs such as travel, computer cost, typing, etc.

In addition to the monthly progress reports, the contractor shall prepare monthly and mid-monthly status summaries (in a Microsoft Excel compatible format) to the EPA WAM and EPA PO. The EPA WAM will provide the template for these monthly and mid-monthly status summaries. The monthly and mid-monthly status reports shall list the following information by task: summaries of current and cumulative costs and LOE expended for the reporting period. The mid-monthly and monthly summaries of costs and expenditures LOE shall be provided prior to the progress report.

TASK 1 - DELIVERABLES

Milestone/Reporting Requirement	Schedule
Work Plan	• 25 days from issuance of work assignment
Progress Reports	• Monthly
Mid-Monthly Reports	• Mid-monthly and monthly

Task 2 – Quality Assurance

This task includes updating the Quality Assurance Project Plan (QAPP), developed by the contractor under a separate EPA contract (68-C-02-095). The QAPP update shall document how quality assurance and quality control will be applied to the development of the Loading Tool and any data feeds to and from ECHO. The Office of Enforcement and Compliance Assurance (OECA) will use the QAPP to demonstrate compliance with EPA's quality system requirements set forth in EPA Order 5360.1 and EPA "Requirements for Quality Assurance Project Plans," EPA QAIG-5, December 2002. In particular, it is the policy of OECA that QA activities shall be conducted to assure environmental data generated, processed or used for its program requirements will be of known quality, and will achieve prescribed data quality objectives. Furthermore, the data will be adequate and sufficient for their intended use. The updated QAPP shall include:

- a description of how the compliance/enforcement data will be generated; compiled, and organized by the contractor;
- a description of any data feeds to ECHO and procedures for verifying and evaluating these data feeds;
- documentation of select logic, and pull/refresh dates; and
- description of how the contractor will evaluate the ICIS-NPDES DMR data for completeness, reasonableness, and comparability; verify that loading tool calculations are correct; and test and evaluate the software tool.

This quality plan will address the types of quality issues common to DMR data and software development projects. In particular, the quality plan will identify the source of the data used in the Loading Tool, the collection method (batch, web service, etc.), the refresh cycle, and how the data is displayed on the Loading Tool. This information will also be useful to compare data shown on the Loading Tool against the data source (e.g., ICIS-NPDES).

TASK 2 - DELIVERABLES

Milestone/Reporting Requirement	Schedule
Updated Quality Assurance Project Plan	• 12 weeks from acceptance of work plan
Revised Updated Quality Assurance Project Plan	• 2 weeks after receipt of comments from EPA

Task 3 – Integration with ICIS-NPDES

The contractor will develop a concept memo to identify the options for building an automatic connection between the Loading Tool Oracle database and ICIS-NPDES. This will be Version 2.0 of the Loading Tool. This connection will enable the Loading Tool to show more recent DMR data on a monthly or bi-monthly data refresh cycle. The contract will use the 'change data capture' method to minimize the amount of processing time for pollutant loading calculations. The contractor will identify in the draft memo all the necessary permissions for servers and data files. The EPA WAM will assist the contractor in getting these necessary permissions. The contractor will also prepare mock-ups of how the ICIS-NPDES data from the current year (2013) will be displayed in the Loading Tool. This will include all searches across the Loading Tool. Finally, the contractor will also mock-up how the Loading Tool can incorporate data from the Chesapeake Bay TMDL into the Loading Tool and make searching these data easier for the Chesapeake Bay Program Office (CBPO). The contractor should plan on having one conversation with CBPO that will be arranged by the EPA WAM. Finally, the contractor will incorporate EPA WAM comments into a revised concept memo. This memo will be suitable for publication on the Loading Tool and will explain in plain language and diagrams how the Loading Tool will automatically refresh on a monthly or more frequent basis.

The contract will use the concept memo to build out the functionality and connections necessary to link ICIS-NPDES and the Loading Tool. These connections will be tested on a development server prior to deployment to ensure that all data from ICIS-NPDES are correctly loaded into the Loading Tool and that the 'change data capture' method is correctly identifying and processing recently modified ICIS-NPDES data. After successful testing, the contractor will work with EPA NCC staff to deploy the new Loading Tool webpages showing ICIS-NPDES data from the current year and the ICIS-NPDES/Loading Tool linkage to EPA's staging and production servers.

TASK 3 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Concept memo for automatic connection between ICIS-NPDES and the Loading Tool Oracle database	• 4 weeks after work plan acceptance.
Revised concept memo for automatic connection between ICIS-NPDES and the Loading Tool Oracle database	• 2 weeks after EPA WAM comments
Deployment of Loading Tool test site on Contractor's servers	• October 6, 2013.
Deployment of Loading Tool to EPA's staging and development servers (Version 2.0)	• October 23, 2013

Task 4 – Enhancements for More Efficient Enforcement - The contractor shall not begin work on this Task until written direction is given by the EPA WAM.

The contractor will enhance the Loading Tool to include a new “Effluent Limit Exceedances Search”, which will be located on the “Everyday Searches” tab. This new search will identify instances where discharge monitoring data indicates there was an exceedance of the NPDES permit effluent limit.

The purpose of this new search will include:

- Intuitive searching on “who” is discharging “what” and “where” and “when,” which provides maximum flexibility.
- Searches can be broad (nationwide) or location-based on user criteria and also allow the user to conduct searches based on watersheds.
- Searches using Facility Name will return all matching facility names, which can be useful for investigations of large companies with multiple facilities (however, will not catch all facilities for a corporate if the facility uses a different name).
- Searches using NPDES, FRS, and TRI will accept up to 400 IDs in each text box (separated by carriage returns or commas), which can be useful if a set of facilities are targeted.

This new search will be deployed as part of Version 2.0.

Users will be able to identify facilities of interest and then click on the NPDES ID to drilldown and get facilities specific results. This report would provide facilities specific details showing all effluent exceedances for each facility for every pipe, pollutant and corresponding limit, and monitoring period. The search results for this project proposal would include the following fields:

- NPDES Permit Number;
- Facility Name;
- Monitoring Period Date;
- Outfall Number;
- Average Daily Flow (MGD);
- Parameter Description;
- Parameter Code;
- Limit Type (e.g., Daily Max, Daily Average, Monthly Average);
- DMR Value Exceeding Effluent Limit;
- Units for DMR Value Exceeding Effluent Limit;
- Effluent Limit; and
- Units for DMR Value Exceeding Effluent Limit.
- Corresponding “Load Over Limit”

Users will be able to easily print these search results, which can be useful for enforcement staff preparing an enforcement action.

Users will also be able to add the following fields to their search results. This may prevent the user from printing the search results but will provide maximum power in sorting, filtering, and exporting the search results. This includes the identification of the "Load over Limit" and the receiving waterbody data. These additional fields include:

- SIC Code
- NAICS Code
- FRS ID
- Facility Type Indicator
- Permit Type
- City
- State
- ZIP Code
- County
- EPA Region
- Congressional District
- Facility Latitude
- Facility Longitude
- Major/Minor Status
- Receiving Waterbody Name (from GNIS)
- Waterbody Number (REACH Code)
- Watershed Name
- Watershed Number (HUC12)
- Listed for Impairment? (Yes/No)
- Impairment Class
- Cause of Impairment
- Potential Link of Impairment Cause to Facility Discharge (Yes/No)
- Number of CSO Outfalls (if applicable)
- Total Facility Design Flow (MGD)
- Actual Average Facility Flow (MGD)
- Monitoring Location Code
- Monitoring Location Latitude
- Monitoring Location Longitude
- Limit Set Designator
- Season Number
- CAS Number
- Substance Registry System ID
- Pollutant Load (kg/period)
- Max Allowable Load (kg/yr)
- Load Over Limit (Option 1) (kg/period)
- Load Over Limit (Option 2) (kg/period)
- Wastewater Flow (MGal/period)
- Average Daily Load (kg/day)
- Non-detect Flag
- Potential Outlier?

The results from this new search feature will readily allow the NPDES enforcement staff and the public to identify and sort effluent exceedances. These results will be displayed on a webpage and will be sortable (e.g., descending order of facilities with highest effluent exceedances, most "load over limits"). These results will also be suitable for printing and be formatted for download to an Excel file.

The contractor shall not begin work on this Task until written direction is given by the EPA WAM. This Task is limited to 160 hours.

TASK 4 – DELIVERABLES

Milestone/Reporting Requirement	Schedule
Mock-up of “Effluent Limit Exceedances Search” (user interface and results)	• 4 weeks after direction from EPA WAM
Revised Mock-up of “Effluent Limit Exceedances Search” (user interface and results)	• 2 weeks after EPA WAM comments
Deployment of draft Effluent Limit Exceedances Search for EPA Regional and state testing	• October 6, 2013
Deployment of Effluent Limit Exceedances Search (Version 2.0)	• October 23, 2013

Task 5 – Version 1.2 and Comparative Analysis of DMR and TRI Data for Region 3 Facilities

This Task will complete Version 1.2 of the Loading Tool, which was started in the previous period of performance (POP) under this contract. Specifically, this Task will support the incorporation of comments, error correction, and documentation for the public release of Version 1.2.

This Task will also complete the “Comparative Analysis of DMR and TRI Data for Region 3 Facilities,” which was started in the previous POP under this contract. Specifically, this Task will support the incorporation of comments, error correction, and documentation for the final version of this report.

This task will assess the precision, accuracy, representativeness, and completeness of Toxics Release Inventory (TRI) surface water release estimates as compared to Clean Water Act (CWA) Discharge Monitoring Report (DMR) data for the years 2007 through 2012. These two data sets are independently collected and managed and can be compared at the facility and pollutant level. This task will explore the differences between these two data sets and how they are used to estimate releases of toxic pollutant discharges to surface waters. This task will focus on facilities and pollutant discharges in Region 3. This analysis will include the new 2011 TRI reported chemicals.²

Focus Area 1: The contractor will evaluate the results of a group (randomly selected or a census of a geographic area) of the same facilities for the same chemicals (PBTs should be included in this list of chemicals) that are being reported in TRI and the DMR for the Region or a state. The contractor will review for any discrepancies such as omissions, under reporting, over reporting, and determine the reason why. This information will help assess the precision and accuracy of TRI releases to surface waters as compared to DMR data.

² See: http://www.epa.gov/tri/lawsandregs/ntp_chemicals/final.html

Focus Area 2: Using the results of Focus Area 1 the contractor will assess whether the Loading Tool identifies more toxic chemical releases (as measured in toxic-weighted pollutant equivalents) that the TRI reporting for the same industrial sectors. PBTs will also be specifically addressed among other TRI chemicals.

Focus Area 3: Using the results of Focus Area 1, the contractor shall assess the representativeness and completeness of TRI releases to surface waters as a percentage of the total amount of toxics released to surface waters (as calculated from the Loading Tool). In particular, the contractor will explore whether there are chemicals, or sectors, that are large contributors to toxic chemicals that are not reported in TRI. The contractor will identify in the draft report any recommended follow-up actions such as whether additional sectors or chemicals would be proposed for TRI reporting.

Focus Area 4: This case study will assess the occurrence of TRI chemicals as listed causes of impaired waters and TMDLs. The contractor will document the relevance of the TRI chemicals to impaired waters and TMDLs.

Focus Area 5: This task will also compare the results of toxicity weighting using the Risk-Screening Environmental Indicators (RSEI) toxic weighting factors versus the Loading Tool toxicity weighting factors (TWF). The contractor will document and explain key differences in the draft report, which will also include any recommendations to the TWF or RSEI toxicity weights calculations.

This Task is limited to 210 hours.

DELIVERABLE SCHEDULE	
Deliverable	Due Date
Version 1.2 of the Loading Tool and Supporting Documentation (Including updated User Guides) – Deployment to EPA Staging and Production Servers	• 25 days from issuance of work assignment
Draft Report – “Comparative Analysis of DMR and TRI Data for Region 3 Facilities”	• 6 weeks after direction from EPA WAM
Final Report – “Comparative Analysis of DMR and TRI Data for Region 3 Facilities”	• 2 weeks after EPA WAM comments

7. CONTRACT SOW REFERENCE

This Work Assignment will draw on the following sections of the Contract SOW:

- Task Area II.4 - Data Management: Data Exchange within EPA and Other Agencies
- Task Area II.5 - Data Management: Software Development/Programming Support
- Task Area II.6 - Other
- Task Area III 2.a - Targeting and Data Analysis: CWA NPDES

8. ANTICIPATED TRAVEL REQUIREMENTS

EPA does not anticipate the need for non-local travel by contractor employees and/or subcontractors to support the scope of this work assignment.

9. ADDITIONAL CONTROL REQUIREMENTS

- a. Other direct costs. Other direct costs (ODCs) for copying, postage/courier, supplies, computer usage, and graphics are allowed. No other ODCs are allowable as a direct charge to this delivery order without the prior written approval of the Contracting Officer.
- b. Recordkeeping. Upon issuance of written technical direction, the Contractor shall submit for inspection of all work in progress at any time under this work assignment. The Contractor shall develop and maintain files supporting each task.
- c. Resolution of Identified Problems. The contractor shall contact the Contracting Officer (CO) and/or the Project Officer (PO) by telephone to discuss any problems that may adversely affect the work on this Work Assignment. Within five (5) calendar days the contractor shall follow the phone call with a brief written explanation of the problem, including any actions already taken, and/or recommended solutions to correct the problem. Written explanation shall be made available to the CO and the PO.
- d. Notification of Spending. The Contractor shall notify the CO and EPA WAM in writing when 85% of the authorized work assignment LOE/labor hours have been expended.
- e. Contractor Identification. To avoid any perception that contractor personnel are EPA employees, the contractor shall assure that contractor personnel are clearly identified as independent contractors of EPA when attending meetings with outside parties or visiting field sites. When speaking with the public the contractor should refer all interpretations of policy to the EPA WAM.
- f. Limitation of Contractor Activities. The contractor will submit drafts of all deliverables to the EPA Work Assignment Manager (WAM) for review prior to submission of the final product. The contractor will incorporate all EPA WAM comments into all final deliverables, unless otherwise agreed upon by the EPA WAM. The contractor will adhere to all applicable EPA management control procedures as implemented by the EPA Contracting Officer (CO), PO, and WAM.
- g. Deliverable Formatting and Terminology. Throughout this Work Assignment, the contractor shall provide draft and final reports to EPA in electronic and hard copy formats. The EPA WAM and contractor will use the terminology in this work assignment to improve the deliverable review process. See Attachment A. The contractor shall discuss the computer file formats to be used for word processing, spreadsheet, database and graphics with the EPA Work Assignment Management (WAM) prior to file preparation.

- h. Deliverables. Major technical reports shall be subject to internal contractor peer review by an expert(s) not directly involved in the mainstream Work Assignment tasks. Deliverables will be prepared with proper adherence to EPA style and format requirements. See Attachment A.
- i. Deadlines. For the purpose of developing this work plan, the contractor shall assume the deliverable due dates provided with each task. The EPA WAM/PO also will use written technical direction to change a deadline if management requires any particular deliverable earlier than specified in the following tasks. For any deliverable, no deadline will extend beyond the WA period of performance.
- j. Organizational Conflict of Interest. The Contractor shall warrant that, to the best of the Contractor's knowledge and belief, there are no relevant facts or circumstances which could give rise to an organizational conflict of interest, as defined in FAR Subpart 9.5, or that the contractor has disclosed all such relevant information. See contract clause 1552.209-71 Organization of Conflict of Interest.
- k. Notification of Conflicts of Interest Regarding Personnel. The Contractor shall immediately notify the Project Officer and the Contracting Officer of (1) any actual or potential personal conflict of interest with regard to any of its employees working on or having access to information regarding this contract, or (2) any such conflicts concerning subcontractor employees or consultants working on or having access to information regarding the contract, when such conflicts have been reported to the Contractor. A personal conflict of interest is defined as a relationship of an employee, subcontractor employee, or consultant with an entity that may impair the objectivity of the employee, subcontractor employee, or consultant in performing the contract work. See Section H.4, contract clause EPAAR 1552.209-73 Notification of Conflict of Interest.
- l. Enforcement Sensitive Information. This work assignment will not likely involve enforcement sensitive information. In the event that EPA does require the contractor to handle enforcement sensitive information, the contractor recognizes that this information should not be released to the public without EPA approval. Enforcement sensitive refers to records or information compiled for law enforcement purposes (whether administrative, civil or criminal), the disclosure of which could reasonably be expected to interfere with the enforcement action. It is imperative that all contractor personnel, including but not limited to, subcontractor and consultant personnel assigned to work on this contract and/or WA, or with access to materials developed pursuant to such efforts, understand that this information is confidential and any disclosure or misuse of the information may result in prosecution to the fullest extent of the law. All contractor personnel are expected to exercise due diligence in safeguarding, handling or disposing of any such information.
- m. Handling of Confidential Business Information (CBI). EPA does not anticipate the need for the contractor to handle CBI for this work assignment, as all of the data in ICIS-NPDES and PCS are not CBI.

Attachment A – Improving the Deliverable Review Process

This Work Assignment involves the production of several types of written products ranging from deliberative memos to published reports. The general workflow is for EPA to provide written guidance to the contractor on the development of these products. The contractor then develops the initial versions of these products. EPA reviews and revises these documents prior to finalization. Several iterations of development, review, and revision may be necessary prior to product finalization. The EPA WAM and contractor will use the following terminology and clarify the expectations for each deliverable via written direction.

Clarification of Terminology

One way for EPA to anticipate the amount of EPA review necessary for a contractor deliverable would be to better define the phase or version of the document in the development, review, and revision process. The following terms will be used in describing the phase or version of the contractor's deliverables: Concept Memo, First Draft, and Draft Final. These phases are described below.

Concept Memo – A document used to present ideas for discussion. The writing style is not necessarily formal and may be as simple as presenting a list of ideas or options. The concept memo is considered an internal deliberative document and may be the result of prior topic discussions (and brainstorming meetings) between EPA, the contractor, and other stakeholders. EPA does not expect this type of document to have received senior technical review or the input of a technical editor. However, the concept memo is expected to have received some level of review (e.g., an internal contractor “peer-to-peer” review) prior to delivery to EPA. Based on past experience, a concept memo is most useful as a tool to guide EPA in determining the desired audience and structure of a future “public-ready” work product.

First Draft – An early version of a document that will ultimately be “public-ready”. The document may still be an internally deliberative product. The writing style is clear but formal. The audience and structure (such as outline or questions to be answered) have been previously defined by and reviewed with EPA. This version is considered appropriate for senior technical review (STR), particularly to confirm that the document answers the questions it is meant to address and that the document is appropriate for the intended audience. It is not unreasonable to expect that STR results in further conversations with EPA. EPA's review of the deliverable is intended to confirm that ideas and concepts are presented as intended.

Draft Final – A “public-ready” document that is ready for distribution to an internal audience (e.g., EPA workgroup) or external audience (e.g., EPA's Docket). The contractor will confirm with EPA the intended audience for this document. Additionally, this version of the document incorporates EPA's comments on the previous versions of the document. Prior to submission to EPA the document will be reviewed by a technical editor to ensure consistency with the Executive Memorandum on 1 June 1998 directing the Executive Departments and Agencies to